

MEMO ENDORSED

March 26, 2021

Via ECF

The Honorable Katherine Polk Failla,
United States District Court for the
Southern District of New York,
40 Foley Square, Room 2103,
New York, New York 10007.

Re: *Arkansas Teacher Retirement System v. Allianz Global Investors U.S. LLC, et al.*, No. 20-cv-05615;
Retirement Program for Employees of the Town of Fairfield, et al. v. Allianz Global Investors U.S. LLC, No. 20-cv-05817;
Lehigh University v. Allianz Global Investors U.S. LLC, et al., No. 20-cv7061;
Teamster Members Retirement Plan v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-07154;
Blue Cross and Blue Shield Association National Employee Benefits Committee v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-07606;
Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, et al. v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-07842;
Chicago Area I.B. of T. Pension Plan & Trust, et al. v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-07952;
The Employees' Retirement System of the City of Milwaukee v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-08642;
The Chicago & Vicinity Laborers' District Council Pension Fund, et al. v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-09478;
The Boards Of Trustees For The Carpenters Health And Security Trust Of Western Washington, et al v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-09479;
United Food & Commercial Workers Unions & Employers Midwest Pension Fund, et al. v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-09587; and
Trustees of the International Brotherhood of Electrical Workers, Local No. 38 Pension Fund Pension Plan v. Allianz Global Investors U.S. LLC, et al., No. 20-cv-10028.

Dear Judge Failla:

In accordance with Rule 21.8 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York, Defendant Allianz Global Investors U.S. LLC ("AllianzGI") respectfully requests Your Honor's approval to permanently seal certain declarations and all accompanying exhibits filed on February 25, 2021 in support of motions to dismiss in the above-referenced actions. Certain exhibits to these declarations included financial account numbers and taxpayer-identification numbers that inadvertently were not redacted as required under Federal Rule of Civil Procedure 5.2. As instructed by the Clerk's

The Honorable Katherine Polk Failla

-2-

Office, these declarations and all their accompanying exhibits will be re-filed today, with the information referenced above redacted from certain exhibits. AllianzGI has requested that the Clerk's Office temporarily seal the declarations and exhibits pending Your Honor's ruling on this request to permanently seal them.

The declarations with the affected exhibits to be permanently sealed are located at the following docket entries:

- No. 20-cv-05615 – ECF No. 84;
- No. 20-cv-05817 – ECF No. 56;
- No. 20-cv-07061 – ECF Nos. 56 & 58;
- No. 20-cv-07154 – ECF Nos. 72 & 74;
- No. 20-cv-07606 – ECF No. 73;
- No. 20-cv-07842 – ECF No. 54;
- No. 20-cv-07952 – ECF No. 72;
- No. 20-cv-08642 – ECF No. 98;
- No. 20-cv-09478 – ECF No. 64;
- No. 20-cv-09479 – ECF No. 64;
- No. 20-cv-09587 – ECF No. 53; and
- No. 20-cv-10028 – ECF No. 46.

Respectfully,

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.
Stephanie G. Wheeler
Kathleen Suzanne McArthur
Ann-Elizabeth Ostrager
Jacob M. Croke
Hilary M. Williams
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004-2468
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

/s/ Robert A. Skinner

Robert A. Skinner
Amy D. Roy
Mary Elizabeth Brust
Cole A. Goodman
ROPES & GRAY LLP
Prudential Tower
800 Boylston
Boston, MA 02199
Telephone: (617) 951-7000
Facsimile: (617) 951-7050

Counsel for Defendant Allianz Global Investors U.S. LLC

cc: All parties of record (by ECF)

Application GRANTED. Due to the sensitive information contained therein, the docket entries specified above shall be sealed, viewable only to the Court and parties.

SO ORDERED.

Dated: March 26, 2021
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE